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August 4, 2021

Via ECF

Hon. Debra Freeman, U.S.M.J.
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jeffrey M. Goldman v. Sol Goldman Investments LLC, et al.
Civil Action No.: 1:20-cv-6727

Dear Judge Freeman:

As you are aware, this firm represents Defendants Sol Goldman Investments LLC (“SGI”), Solil Management, LLC (“Solil”), and Jane H. Goldman (collectively, “Defendants”) in the above styled matter.

At last Friday’s telephonic discovery conference, the Court directed the parties to provide a joint status update by Tuesday (yesterday) regarding the scheduling of depositions and other issues. We apologize for the delay in submitting this joint letter but we only received a response from Plaintiff’s counsel to our inquiries earlier this afternoon. To that end, the parties have agreed as follows:

- Plaintiff’s deposition will commence at 10:00am on August 17, 2021 (remotely);

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- Defendant Jane Goldman's will commence at 10:00am on August 18, 2021 (remotely); and
- The 30(b)(6) depositions for Defendants Solil Management LLC and Sol Goldman Investments LLC will follow on August 18, 2021 (remotely).

We have been unable to schedule the deposition of Judith Brener as she is traveling and we have been unable to contact her. However, she is anticipated to return on August 12 and we will work to schedule her deposition for no later than September 15, 2021, based on her schedule and the availability of counsel.

Defendants are still awaiting signed HIPAA authorization forms and a list of medical providers from Plaintiff's counsel, who advised upon inquiry that the list will be provided by the afternoon of August 5 at the latest.

We are available to discuss this, or any other matter, at the Court's convenience.

Respectfully,

A handwritten signature in blue ink, appearing to read 'S. Bauchner', with a horizontal line underneath.

Joshua S. Bauchner, Esq.
Ansell Grimm & Aaron, P.C.
Attorneys for Defendants